

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE: William Tagg,

Case No. 21-23424

Debtor.

Chapter 11
Subchapter V

AMENDED OBJECTION TO THE CLAIM OF PHH MORTGAGE CLAIM #1

Comes Now your Debtor to amend the existing objection to the claim he has heretofore filed in this case, and he include the following additional objections:

1. The Debtor paid \$32,000 on a loan modification program which he has never seen credited on the loan.
2. The Debtor was charged for "forced-place" insurance when he always had valid insurance without cancellation. In this view, the account has been overcharged about \$40,000.00.

3. Debtor has furnished this information to the Trustee and other parties and he is unsure what position will be taken ultimately by them on the claim. As the claim may have been paid by a closing, the debtor reserves the right to file an adversary proceeding for a refund if such might be appropriate or to have the case Trustee do so.

WHEREFORE, PREMISES CONSIDERED, DEBTOR PRAYS:

1. That he be allowed to object to the full payment of this claim.
2. For such further and other relief as to which the debtor may be entitled.

RESPECTFULLY SUBMITTED,

/S/ Ted I. Jones

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Memphis, Tennessee 38112
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Attorney for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that on this the 23rd day of June, 2022, a copy of the foregoing electronically filed motion was served on the parties listed below by first-class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

All creditors/interested parties listed on matrix.

/s/ Ted I. Jones

Ted I. Jones